

REMARKS

Reconsideration and withdrawal of the rejections set forth in the Office Action are respectfully requested in view of this amendment and the following reasons. By this amendment, claims 23, 27, and 32-34 have been amended, and claims 20, 25, 26, 29, and 30 have been canceled. Accordingly, claims 21-24, 27, 28, and 31-34 are pending in this application. The cancellation of claims 20, 25, 26, 29, and 30 is made without prejudice or disclaimer to the subject matter contained therein.

Claims 23 and 27 have been amended to recite the present subject matter more clearly. Support for the amended features may be found at least in claim 21. Claim 32 has been amended to correct informalities. Claims 33 and 34 have been amended to make proper reference to claim 21, rather than canceled claim 20. Thus, it is respectfully submitted that the above amendments introduce no new matter within the meaning of 35 U.S.C. §132.

Entry of the Amendment is proper under 37 C.F.R. §1.116 because it (a) places the application in *prima facie* condition for allowance for the reasons discussed herein; (b) does not raise new issues requiring further search and/or consideration by the Examiner because similar subject matter was previously considered by the Examiner and thus further consideration and/or search by the Examiner is not warranted; and (c) places the application in better form for appeal, should an appeal be necessary. For at least these reasons, entry of the present Amendment is therefore respectfully requested. Accordingly, Applicants request reconsideration and timely withdrawal of the pending rejections for the reasons discussed below.

Rejections Under 35 U.S.C. §102

Claims 20-34 stand rejected under 35 U.S.C. §102(b) as being allegedly anticipated by U.S. Patent Application Publication No. 2003/0131250 applied for by Quere (“Quere”).

Applicants respectfully traverse this rejection for at least the following reasons.

Applicants respectfully submit that the rejections of independent claim 21 must be withdrawn because the cited reference does not disclose, teach, or suggest all of the features of the claimed subject matter. “Anticipation requires the disclosure in a single prior art reference of each element of the claim under consideration.” *W.L. Gore & Assocs. V. Garlock*, 721 F.2d 1540, 220 USPQ 303 (Fed. Cir. 1983), cert. denied, 469 U.S. 851 (1984). Further, “when evaluating the scope of a claim, every limitation in the claim must be considered. U.S.P.T.O. personnel may not dissect a claimed invention into discrete elements and then evaluate the elements in isolation. Instead, the claim as a whole must be considered.” *U.S.P.T.O. Interim Guidelines for Examination of Patent Applications for Patent Subject Matter Eligibility*, page 9, October 26, 2005. As the Federal Circuit stated, “[a]nticipation requires the presence in a single prior art reference disclosure of each and every element of the claimed invention, arranged as in the claim.” *Lindemann Maschinenfabrik GmbH v. American Hoist & Derrick Col.*, 730 F.2d 1452, 221 USPQ 481, 485 (Fed. Cir. 1984) (citing *Connell v. Sears, Roebuck & Co.*, 722 F.2d 1542, 220 USPQ 193 (Fed. Cir. 1983)).

In view of this framework, Applicants respectfully submit that it is clear that Quere fails to disclose every recited feature of claim 21. Specifically, claim 21 recites, *inter alia*:

second transmitting verification data obtained by encrypting the

designation information using the verification key, together with a processing command, from the apparatus to the memory device, after first transmitting the designation information;

verifying the verification data using the designation information and the verification key at the memory device

Quere does not disclose, teach, or suggest at least this feature. According to the present subject matter, even when the size of argument included in a memory access command is of 32 bits, for example, if a command for designation information of an access area of a memory device and a processing command for the access area are divided, these two commands need to be verified respectively. The subject matter of claim 21 includes in the processing command for the access area verification data obtained by encrypting designation information with a verification key, so that it is possible to result in enabling verification by one operation using designation information of the access area transmitted in advance.

In contrast, Quere teaches that microprocessor μP_1 reports to an automatic device an initialization signal INIT including an address value in a memory that stores a command block and that operates outside. In other words, it reports to an automatic device a memory address of a control zone to which an access is intended (Paragraphs [0057]-[0059]). Here, however, Quere fails to disclose, teach, or suggest how to utilize this reported memory address.

On the other hand, Quere also teaches that the process or algorithm for encryption/decryption or signature/verification of signature is executed by a parallel configuration of secure management modules or a module configuration (Paragraphs [0063]-[0077]). However, in Quere, a buffer address points to a buffer memory zone for data to be

encrypted in an external memory RAM and a secure device for secure management of data writes encrypted data to the same address as input data and overwrites the buffer memory zone containing input data (Paragraphs [0063]-[0073]). Data obtained by encrypting or applying signature to input data is written back. In view of this, *inter alia*, it is respectfully submitted that Quere does not disclose, teach, or suggest at least “transmitting verification data obtained by encrypting the designation information using the verification key, together with a processing command, from the apparatus to the memory device, after first transmitting the designation information,” as recited in claim 21. Also, in the same context, Quere fails to disclose, teach, or suggest at least “verifying the verification data using the designation information and the verification key at the memory device.”

Therefore, Quere does not anticipate the presently claimed subject matter, according to which, in a processing command for the access area verification data obtained by encrypting destination information with a verification key, it is possible to enable verification by one operation using designation information of the access area transmitted in advance. Because Quere fails to disclose every recited claim feature, it is respectfully submitted that the reference does not anticipate claim 1.

Accordingly, Applicants respectfully request withdrawal of the 35 U.S.C. §102(b) rejection of claim 21. Claims 20, 25, 26, 29, and 30 have been canceled without prejudice or disclaimer, thereby rendering the rejection thereof moot. Claims 22, 23, 27, 31, and 32 recite similar features as claim 21 and thus are allowable for at least this reason. Claims 24, 28, 33, and 34 depend from claim 21, 23, or 27 and are allowable for at least this reason. Since none of the

other prior art of record discloses or suggests all the features of the claimed subject matter,

Applicants respectfully submit that independent claims 21-23, 27, 31, and 32, and all the claims that depend therefrom, are allowable.

CONCLUSION

Applicants believe that a full and complete response has been made to the pending Office Action and respectfully submit that all of the stated grounds for rejection have been overcome or rendered moot. Accordingly, Applicants respectfully submit that all pending claims are allowable and that the application is in condition for allowance.

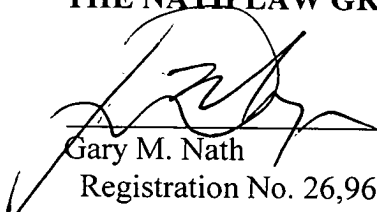
Should the Examiner feel that there are any issues outstanding after consideration of this response, the Examiner is invited to contact Applicants' undersigned representative at the number below to expedite prosecution.

Prompt and favorable consideration of this Reply is respectfully requested.

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